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December 2, 2021

**BY ECF**

The Honorable Loretta A. Preska  
United States District Court, Southern District of New York  
United States Courthouse, Courtroom 12A  
500 Pearl Street  
New York, NY 10007-1312

**Re: Berall v. Teleflex Medical Incorporated, C.A. No. 1:10-cv-05777-LAP-DCF (S.D.N.Y.)**

Dear Judge Preska:

We represent Teleflex Medical Incorporated ("Teleflex"). On March 23, 2021, Teleflex requested the Court's permission to file a motion for a protective order to prevent discovery related to Airtraq laryngoscopes manufactured by Prodol Meditec S.A. ("Prodol Products"), which were distributed by Teleflex in the United States beginning in 2015. The basis for Teleflex's request was that the Prodol Products had no relation to the original defendant LMA North America, Inc. or any allegation pleaded in the Original Complaint or First Amended Complaint. (Dkt. 1, 193). On November 1, 2021, the Court permitted Plaintiff to file a Second Amended Complaint, which Plaintiff filed on November 4, 2021. The new allegations in Plaintiff's Second Amended Complaint include a cause of action against Teleflex for its distribution of the Prodol Products. In view of these new allegations, Teleflex hereby withdraws its letter request to file a motion for a protective order filed under Docket Entry No. 278. The parties met and conferred and Plaintiff does not oppose this request.

Respectfully submitted,

**SO ORDERED.**

By: /s/ Jonathan R. Wise

Dated: December 3, 2021  
New York, New York

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A handwritten signature in black ink, reading "Loretta A. Preska", written over a horizontal line.

LORETTA A. PRESKA

Senior United States District Judge

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***Counsel for Defendant Teleflex Medical Incorporated***

cc: Counsel of Record via ECF